

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE: USA GYMNASTICS,¹
Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF DRAW RE: MONTHLY FEE STATEMENTS
OF MILLER JOHNSON AS SPECIAL COUNSEL TO THE DEBTOR IN POSSESSION,
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES,
FROM SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 2019
PURSUANT TO ORDER GRANTING DEBTOR'S MOTION
FOR ENTRY OF ORDER ESTABLISHING PROCEDURES FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF PROFESSIONALS [DN 187]**

Notice is hereby given that Miller Johnson, Special Counsel to the Debtor In Possession, has filed its Consolidated Monthly Statements of Fees and Expenses for the Period From September 1, 2019 through September 30, 2019, with the Bankruptcy Court.

Notice is further given that said statements, which include total fees of \$59,229.50 and total expenses of \$993.22, are attached to hereto as **Exhibits A(1) – A(2)**.

If you have an objection to all or any portion of any of the above-referenced statements, you have fourteen (14) days from the date this notice is filed with the Court to serve a written Notice of Objection on Miller Johnson. Attn: John T. Piggins, P.O. Box 306, Grand Rapids, Michigan 49501-0306 and by email at pigginsj@millerjohnson.com. The Notice of Objection must set forth the precise nature of the objection and the amount at issue.

If no Notice of Objection is timely served on Miller Johnson, the Debtor shall promptly pay 80% of the fees and 100% of the expenses set out above, subject to final approval by the Court at a future hearing.

If a timely Notice of Objection is served regarding some but not all of the above-referenced fees and expenses, the Debtor shall promptly pay 80% of the fees and 100% of the expenses that are not the subject of a timely Notice of Objection, subject to final approval by the Court at a future hearing.

If you serve a Notice of Objection on Miller Johnson and you are unable to resolve your objection within fourteen (14) days after service, you may file your objection with the Court.

Upon filing an objection with the Court, a subsequent Notice will be sent to you with the date, time and location of the hearing on the objection.

¹ The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

**A COPY OF ANY OBJECTION
FILED WITH THE COURT MUST ALSO BE SENT TO:**

Office of the United States Trustee
101 W Ohio St
Indianapolis, IN 46204

Miller Johnson
Attn: John T. Piggins
P.O. Box 306
Grand Rapids, MI 49501-0306

And by email to:
pigginsj@millerjohnson.com

Sexual Abuse Survivors Committee
c/o Meredith R. Theisen
Rubin & Levin, P.C.
135 N. Pennsylvania St., Suite 1400
Indianapolis, IN 46204

And by email to: mtheisen@rubin-levin.net

USA Gymnastics
130 E. Washington Street
Suite 700
Indianapolis, IN 46204

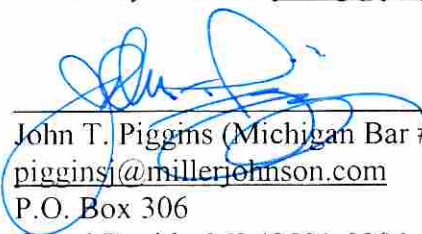
Dean Panos, Esq.
Melissa M. Root, Esq.
Catherine L. Steege, Esq.
Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654

And by email to dpanos@jenner.com;
mroot@jenner.com; and
csteeg@jenner.com

Sexual Abuse Survivors Committee
c/o James I. Stang
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Blvd.
Ste 1300
Los Angeles, CA 90067

And by email to: jstang@pszjlaw.com

Date: October 22, 2019



John T. Piggins (Michigan Bar #P34495)
pigginsj@millerjohnson.com
P.O. Box 306
Grand Rapids, MI 49501-0306
(616) 831-1793

EXHIBIT A(1)

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

Page 1
Inv# 1711518
Date 10/18/2019
42721.00002-DJG

USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: Ropes & Gray and Other Investigations

For Legal Services Rendered through September 30, 2019

9/01/19	CJS	Initial analysis of topics for meeting with Indiana AG's office	.10	35.00
9/01/19	CJS	Correspondence with Cathy Steege and Mark Stuaan regarding topics for meeting with Indiana AG	.20	70.00
9/03/19	CJS	Correspondence with Mark Stuaan and Cathy Steege regarding Indiana AG meeting	.20	70.00
9/06/19	CJS	Prepare for meeting with Indiana Attorney General with Li Li Leung, Cathy Steege, Melissa Root, Mark Busby, and Shelba Waldron	2.50	875.00
9/06/19	CJS	Meeting with Indiana Attorney General's office	3.50	1,225.00
9/06/19	CJS	Return to Michigan after meeting with Indiana Attorney General	4.00	1,400.00
9/13/19	CJS	Correspondence from Mark Stuaan regarding privilege issue	.20	70.00
9/20/19	JWC	Update production tracking spreadsheet with additional details	1.80	270.00
9/20/19	CJS	Revise proposed correspondence, per request from Gayle Littleton	.40	140.00
9/20/19	CJS	Correspondence with Indiana AG regarding Board minutes	.20	70.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 2
Inv# 1711518
Date 10/18/2019
42721.00002-DJG

9/21/19	CJS	Review draft correspondence from a Gayle Littleton	.10	35.00
9/27/19	CJS	Telephone conference with Kathryn Carson, Dean Panos, and Cathy Steege regarding Section 8 matter	.40	140.00

TOTAL HOURS 13.60

Total Services 4,400.00

Attorney Summary

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Casteel, James W	Lit Support Proj Mg	1.80	150.00	270.00
Schneider, Christopher J.	Member	11.80	350.00	4,130.00
		13.60		4,400.00

Total This Invoice 4,400.00

Invoices Due Upon Receipt

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 3
Inv# 1711518
Date 10/18/2019
42721.00002-DJG

OUTSTANDING ACCOUNTS RECEIVABLE

INVOICE NUMBER	DATE	INVOICE AMOUNT	PAYMENTS AGAINST INVOICE	INVOICE BALANCE
1690140	2/14/19	46,412.85	37,183.65	9,229.20
1691019	3/18/19	26,448.80	21,491.90	4,956.90
1694036	4/17/19	21,810.30	17,454.60	4,355.70
1696898	5/21/19	18,459.25	14,769.05	3,690.20
1699810	6/13/19	12,034.50	9,627.60	2,406.90
1702745	7/15/19	11,082.50	8,866.00	2,216.50
1705620	8/20/19	12,567.50	10,054.00	2,513.50
1708523	9/20/19	8,426.00	.00	8,426.00
Prior Unpaid Balance				37,794.90
Total Amount Due				42,194.90

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

Inv# 1711518
Date 10/18/2019
42721.00002-DJG

USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: Ropes & Gray and Other Investigations

REMITTANCE ADVICE

For Legal Services Rendered through September 30, 2019

Total Services 4,400.00

Total This Invoice 4,400.00
=====

Invoice Is Due Upon Receipt

Our remit address is: PO Box 306, Grand Rapids, MI. 49501-0306

Payments: If paying by check please return the remittance advice or write your invoice number(s) on your check. You may also pay by credit or debit card through our online payment portal www.millerjohnson.com/onlinepayments. If you have any questions regarding this invoice or you wish to set up ACH payments please call 616-831-1700 and ask for the collections department.

EXHIBIT A(2)

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

Page 1
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: CJS Chief Legal Officer

For Legal Services Rendered through September 30, 2019

9/01/19	CJS	Correspondence with Jacqui Godfrey regarding selection committee matter	.10	35.00
9/02/19	DAP	Exchange emails with Aon regarding new claim	.30	135.00
9/03/19	NJM	Office conference with Christopher J. Schneider regarding hearing preparations	.30	90.00
9/03/19	DAP	Review discovery request in third-party personal injury case from Illinois and office conference with Christopher J. Schneider regarding response	.30	135.00
9/03/19	DAP	Prepare response to discovery request in third party-personal injury case from Illinois	.60	270.00
9/03/19	CJS	Telephone conference with Trampoline & Tumbling Selection Committee and Ethics and Grievance Committee regarding conflict issue	.80	280.00
9/03/19	CJS	Revise proposed communications statement to reflect legal advice	.10	35.00
9/03/19	CJS	Correspondence with D. Andrew Portinga regarding response to third party discovery request	.10	35.00
9/03/19	CJS	Correspondence with Erica Koven regarding response to third party	.10	35.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 2
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

discovery request

9/03/19	CJS	Correspondence with insurer regarding intellectual property matter	.10	35.00
9/03/19	CJS	Attend senior leadership team meeting by telephone	1.00	350.00
9/03/19	CJS	Office conference with Neil J. Marchand regarding support for SafeSport hearing process	.30	105.00
9/03/19	CJS	Office conference with D. Andrew Portinga regarding third-party discovery requests and other open matters	.30	105.00
9/03/19	CJS	Revise venue contract for Trampoline & Tumbling event	1.50	525.00
9/03/19	CJS	Correspondence with coverage counsel regarding lost policy issue	.10	35.00
9/03/19	CJS	Correspondence with Stefanie Korepin and Brittany R. Harden regarding copyright matter	.10	35.00
9/03/19	CJS	Correspondence with Stefanie Korepin regarding conflict of interest policy	.30	105.00
9/03/19	CJS	Correspondence from Mark Busby regarding SafeSport matters	.20	70.00
9/04/19	ACC	Review report of the women's Pan American games athlete selection committee minutes and related selection procedures	1.00	215.00
9/04/19	ACC	Email to Stefanie Korepin outlining talking points regarding report of the women's Pan American games athlete	.40	86.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 3
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

		selection committee minutes and related selection procedures		
9/04/19	ACC	Per Christopher J. Schneider request, review personnel file	.70	150.50
9/04/19	ACC	Emails to USAG regarding upcoming Men's selection committee meeting	.10	21.50
9/04/19	MMO	Draft [REDACTED]	1.40	385.00
9/04/19	MDP	Email from Stefanie Korepin regarding contractor agreement	.10	19.50
9/04/19	DAP	Communication with insurer regarding insurance claim	.30	135.00
9/04/19	CJS	To Indianapolis for CLO work	4.30	1,505.00
9/04/19	CJS	Onsite CLO work at USA Gymnastics	3.50	1,225.00
9/04/19	MLT	Communications with Christopher J Schneider regarding personnel matter	.10	40.00
9/05/19	AMC	Review and provide comments to draft contractor agreement	.70	203.00
9/05/19	ACC	Review men's selection procedures prior to selection committee meeting	1.00	215.00
9/05/19	ACC	Conference with men's selection committee and Mary McDaniel to assist as independent observer of procedure for selection	.80	172.00
9/05/19	MMO	Draft Termination Agreement and Release to terminate independent contractor agreement	2.30	632.50
9/05/19	MDP	Review and revise USA Gymnastics	1.60	312.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 4
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

Master Services Agreement with
contractor

9/05/19	MDP	Telephone conference call with Christopher J. Schneider discussing Master Services Agreement with contractor	.10	19.50
9/05/19	MDP	Conference with Anne Marie Carson discussing revisions to Master Services Agreement with contractor	.10	19.50
9/05/19	MDP	Send Master Services Agreement with contractor to Stefanie Korepin at USA Gymnastics	.10	19.50
9/05/19	MDP	Draft form Event Agreement for USA Gymnastics premiere events	1.20	234.00
9/05/19	CJS	Onsite CLO work at USA Gymnastics	8.30	2,905.00
9/06/19	MDP	Continue drafting form Event Agreement for premiere events and send to Christopher J. Schneider	3.50	682.50
9/06/19	CJS	CLO work on site at USAG	1.80	630.00
9/07/19	ACC	Attend second meeting of men's selection committee as independent observer	.90	193.50
9/08/19	CJS	Revise communications document to reflect legal advice, for Leslie King	.40	140.00
9/09/19	ACC	Review selection committee minutes from men's selection committee meeting	.20	43.00
9/09/19	CJS	Correspondence with Leslie King regarding legal advice on communications statement	.10	35.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 5
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/09/19	CJS	Correspondence with Michael D. Penny regarding contract	.10	35.00
9/09/19	CJS	Correspondence with Leslie King regarding legal advice on communications document	.10	35.00
9/09/19	CJS	Revise three communications responses to reflect legal advice, for Leslie King	.20	70.00
9/09/19	CJS	Correspondence with Li Li Leung and Stefanie Korepin regarding contractor agreement	.20	70.00
9/09/19	CJS	Revise response to LIU's emergency motion for continuance	.30	105.00
9/09/19	CJS	Begin review of form contract for premier events	.50	175.00
9/09/19	CJS	Telephone conference with Scott Lineberry regarding bylaw issues	.20	70.00
9/09/19	CJS	Revise mark-up to athlete's national team agreement	1.20	420.00
9/09/19	CJS	Telephone conference with Leslie King and Amy Cox regarding national team agreement	.30	105.00
9/09/19	CJS	Telephone conference with Leslie King regarding response to media inquiry	.30	105.00
9/10/19	MDP	Attention to email from Christopher J. Schneider sending background information concerning Cooperation Agreement with USA Gymnastics	.10	19.50
9/10/19	MDP	Conference with Christopher J. Schneider discussing AAF contract	.50	97.50

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 6
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/10/19	CJS	Correspondence with Leslie King and Li Li Leung regarding legal advice on proposed communications statement	.20	70.00
9/10/19	CJS	Analysis of commercial terms for vendor contract	.20	70.00
9/10/19	CJS	Correspondence with Leslie King regarding legal advice on revised communications statement	.20	70.00
9/10/19	CJS	Telephone conference with Jacqui Godfrey regarding selection issues, WADA matter, and contract	.70	245.00
9/10/19	CJS	Analysis of supplier contract in connection with sponsorship designations	.20	70.00
9/10/19	CJS	Correspondence with Li Li Leung and Mark Busby regarding Administrative Holds	.10	35.00
9/10/19	CJS	Telephone conference with Phil Hilder regarding Texas investigation and other open matters	.60	210.00
9/10/19	CJS	Correspondence with Li Li Leung regarding analysis of supplier contract in connection with sponsorship designation	.20	70.00
9/10/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.20	70.00
9/10/19	CJS	Review letter regarding copyright issue	.10	35.00
9/10/19	CJS	Final revisions to athlete national team agreement	.60	210.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 7
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/10/19	CJS	Office conference with Michael D. Penny regarding AAF contract	.20	70.00
9/10/19	CJS	Correspondence with Jacqui Godfrey and David Rudd regarding selection committee matter	.10	35.00
9/10/19	CJS	Revise Board meeting minutes for May, June, and July meetings	1.20	420.00
9/10/19	CJS	Revise proposed communications statements, to reflect legal advice, for Leslie King	.40	140.00
9/10/19	CJS	Revise AAF contract	.50	175.00
9/10/19	CJS	Communications with Leslie King regarding legal advice on communications statements	.50	175.00
9/11/19	DAP	Review and respond to correspondence with insurers	.30	135.00
9/11/19	DAP	Office conference with Christopher J. Schneider regarding media licensing	.20	90.00
9/11/19	CJS	Correspondence with Li Li Leung regarding contract matters	.10	35.00
9/11/19	CJS	Telephone conference with Li Li Leung regarding contract matters	.30	105.00
9/11/19	CJS	Telephone conference with D. Andrew Portinga regarding copyright issue	.10	35.00
9/11/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
9/12/19	MDP	Review and revise USA Gymnastics Consulting Agreement with POV Sports	1.80	351.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 8
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

Marketing

9/12/19	MDP	Conference meeting with Christopher J. Schneider discussing amendment to sponsor agreement	.30	58.50
9/12/19	DAP	Communications with insurer regarding new claim	.30	135.00
9/12/19	CJS	Final review of venue contract	.80	280.00
9/12/19	CJS	Revise reply brief supporting motion for partial summary judgment against TIG	1.50	525.00
9/12/19	CJS	Correspondence from Mark Busby regarding update on SafeSport matter	.10	35.00
9/12/19	CJS	Analysis of current sponsor contract and proposed amendment	1.00	350.00
9/12/19	CJS	Telephone conference with Thad Vandeventer	.20	70.00
9/12/19	CJS	Office conference with D. Andrew Portinga regarding insurance issue in venue contract	.20	70.00
9/12/19	CJS	Begin revisions to amendment to sponsor contract	.60	210.00
9/12/19	CJS	Correspondence with Li Li Leung regarding amendment to sponsor contract	.10	35.00
9/12/19	CJS	Correspondence with Rebecca L. Strauss regarding privilege review	.10	35.00
9/12/19	CJS	Correspondence with Mark Busby regarding Center's decision in SafeSport matter	.10	35.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 9
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/12/19	CJS	Correspondence with Jeff Smith regarding terms in venue contract	.20	70.00
9/12/19	CJS	Telephone conference with Bernadette Barron regarding credit card issue	.10	35.00
9/13/19	MDP	Review and revise amendment to sponsor agreement	3.00	585.00
9/13/19	CJS	Revise proposed communications statement to reflect legal advice	.30	105.00
9/13/19	CJS	Multiple correspondence with communications team regarding legal advice on inquiry from media	.30	105.00
9/13/19	CJS	Revise contract with consulting agency for sponsorships	.80	280.00
9/13/19	CJS	Telephone conference with communications team regarding legal advice on communications statement	.30	105.00
9/13/19	CJS	Telephone conference with Leslie King regarding legal advice on communications statement regarding athlete matter	.30	105.00
9/13/19	CJS	Numerous correspondence with Mark Busby regarding new policy from the Center on letters of admonishment	.40	140.00
9/13/19	CJS	Correspondence with Nikki Warren regarding additional insured certificate	.20	70.00
9/13/19	CJS	Review draft motion to increase PNC card limit	.10	35.00
9/13/19	CJS	Revise first amendment to sponsorship	.50	175.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 10
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

contract

9/14/19	CJS	Revise contract with consulting firm per Li Li Leung comments	.40	140.00
9/15/19	CJS	Correspondence with coverage counsel regarding proposal from insurer	.20	70.00
9/15/19	CJS	Correspondence with Li Li Leung regarding contract matters	.10	35.00
9/15/19	CJS	Revise communications statement to reflect legal advice	.10	35.00
9/16/19	MDP	Draft and compile USA Gymnastics Board of Directors Meeting Minute Approval tracker for 2019 minutes and send to Christopher J. Schneider	.30	58.50
9/16/19	CJS	Onsite CLO work at USA Gymnastics	5.60	1,960.00
9/17/19	MDP	Final Michigan 2019 Annual Report for USA Gymnastics and send to Christopher J. Schneider	.50	97.50
9/17/19	CJS	CLO work on site at USA Gymnastics	4.80	1,680.00
9/18/19	JB	Conference with Christopher J. Schneider and Kristen E. Woods to discuss process for compiling certain documents for upcoming SafeSport audit	.50	67.50
9/18/19	JB	Begin compilation of documents for upcoming SafeSport audit	2.50	337.50
9/18/19	ACC	Prepare for telephone conference with Annie Heffernon related to women's selection committee	.20	43.00
9/18/19	ACC	Telephone conference with Annie Heffernon regarding women's event	.40	86.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 11
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

selection

9/18/19	ACC	Draft notes from telephone conference with Annie Heffernon regarding women's event selection	.30	64.50
9/18/19	ACC	Signed and send report of the women's Pan American games athlete selection committee meeting to Annie Heffernon	.10	21.50
9/18/19	MDP	Attention to email from Christopher J. Schneider discussing background to event agreement	.10	19.50
9/18/19	CJS	Analysis of [REDACTED]	.20	70.00
9/18/19	CJS	Office conference with Kristen E. Woods and Jessica Brickner regarding preparation for the Center's audit	.50	175.00
9/18/19	CJS	Telephone conference with the Center regarding Administrative Holds	.30	105.00
9/18/19	CJS	Telephone conference with Mark Busby regarding clarification of Administrative Holds from the Center	.20	70.00
9/18/19	CJS	Analysis of Administrative Hold issue, in preparation for call with the Center	.50	175.00
9/18/19	CJS	Correspondence with SafeSport team regarding information needed for the Center's audit	.10	35.00
9/18/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.20	70.00
9/18/19	CJS	Revise premier event form agreement and appendix A for 2020 event	2.20	770.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 12
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/18/19	CJS	Correspondence from Melissa Root regarding lease renewal	.10	35.00
9/18/19	KEW	Assist in the organization of information and documentation provided by USAG in response to an audit request by the U.S. Center for SafeSport	2.80	546.00
9/19/19	JB	Continue to compile documents for upcoming SafeSport audit	1.30	175.50
9/19/19	PME	Revise agreement for employees using USA Gymnastics computer equipment	.40	120.00
9/19/19	BRH	Review/correspond with Christopher J. Schneider regarding Warner Music copyright claim to licensed music	.70	203.00
9/19/19	MDP	Send Christopher J. Schneider updated USA Gymnastics Board of Directors meeting minute approval tracker	.30	58.50
9/19/19	MDP	Revise 2019 USA Gymnastics Board of Directors Meeting Minutes	.80	156.00
9/19/19	DAP	Office conference with Christopher J. Schneider regarding copyright issues	.30	135.00
9/19/19	CJS	Analysis to proposed changes to athlete agreement	.20	70.00
9/19/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
9/19/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
9/19/19	CJS	Follow-up with Board of Directors regarding minutes	.10	35.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 13
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/19/19	CJS	Follow-up correspondence with Annie Heffernon and Krissy Klein regarding athlete agreement	.20	70.00
9/19/19	CJS	Correspondence with Amy E. Murphy regarding Ted Stevens Act training	.20	70.00
9/19/19	CJS	Analysis of O-1 visa issue	.20	70.00
9/19/19	CJS	Telephone conference with Jeff Smith regarding revisions to event agreement	1.30	455.00
9/19/19	CJS	Office conference with Michael D. Penny regarding revisions to event agreement	.30	105.00
9/19/19	CJS	Revise event agreement	.70	245.00
9/19/19	CJS	Telephone conference with Li Li Leung regarding status of open legal matters	.30	105.00
9/19/19	CJS	Work with Kristen E. Woods, Jessica Brickner, Erica Koven, and Shelba Waldron regarding information needed for the Center's audit	.60	210.00
9/19/19	CJS	Office conference with D. Andrew Portinga regarding intellectual property matter	.10	35.00
9/19/19	CJS	Correspondence with Shelba Waldron regarding information needed for the Center's audit	.10	35.00
9/19/19	CJS	Revisions to device agreement	.30	105.00
9/19/19	CJS	Telephone conference with Lois Bingham regarding Board of Directors	.20	70.00
9/19/19	CJS	Analysis of Bylaws regarding filling	.30	105.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 14
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

board vacancy

9/19/19	KEW	Assist in the organization of information and documentation provided by USAG in response to an audit request by the U.S. Center for SafeSport	2.00	390.00
9/20/19	JB	Continue to compile documents for upcoming SafeSport audit into an electronic binder	1.70	229.50
9/20/19	ACC	Office conference with Amy E. Murphy regarding independent observer role	.40	86.00
9/20/19	AEM	Office conference with Alejandra Contreras regarding independent observer role for selection committee meetings	.40	116.00
9/20/19	MDP	Review and revise USA Gymnastics Event Agreement and send to Christopher J. Schneider	2.00	390.00
9/20/19	MDP	Compile approved regular and executive meeting minutes for 2019 and send to Leslie King	.60	117.00
9/20/19	MDP	Conference meeting with Christopher J. Schneider discussing USA Gymnastics 2021 College Gymnastics Agreement	.30	58.50
9/20/19	MDP	Review and revise USA Gymnastics 2021 College Gymnastics Agreement and send to Christopher J. Schneider	2.30	448.50
9/20/19	DAP	Communication with Everest Insurance regarding insurance claim	.30	135.00
9/20/19	CJS	Analysis of Bylaws regarding process to fill vacancy on Board of Directors	.50	175.00

PO Box 306
 Grand Rapids, Michigan 49501-0306
 616.831.1700
 TAX ID# 38-1603110

USA Gymnastics

Page 15
 Inv# 1711519
 Date 10/18/2019
 42721.00006-DJG

9/20/19	CJS	Correspondence with Lois Bingham regarding process to fill vacancy on Board of Directors	.20	70.00
9/20/19	CJS	Telephone conference with Lois Bingham regarding process to fill vacancy on Board of Directors	.20	70.00
9/20/19	CJS	Additional revisions to event agreement	1.30	455.00
9/20/19	CJS	Work regarding finalization of regular and executive session minutes through July 2019	.40	140.00
9/20/19	CJS	Follow-up correspondence with Jeff Smith regarding revisions to venue contract	.20	70.00
9/20/19	CJS	Analysis of participant status of individuals subject to the Center's administrative holds	.60	210.00
9/20/19	CJS	Multiple communications with Mark Busby regarding SafeSport matter	.40	140.00
9/20/19	CJS	Analysis of SafeSport matter	.40	140.00
9/20/19	CJS	Draft correspondence to Bernadette Barron regarding financial projections and legal fees, including analysis of prior projections	.50	175.00
9/20/19	CJS	Communications with Stefanie Korepin, Amy E. Murphy, Alejandra Contreras, and Mary McDaniel regarding independent observer work	.60	210.00
9/20/19	CJS	Draft introductions for various sections of the PDF of information for	1.00	350.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 16
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

the Center's audit

9/20/19	CJS	Correspondence with D. Andrew Portinga regarding status update requested by Judge Quist	.10	35.00
9/20/19	CJS	Revise event contract, per request from Stefanie Korepin	1.40	490.00
9/21/19	CJS	Correspondence from Lois Bingham regarding Board vacancy	.10	35.00
9/22/19	AEM	Analyze selection procedures for 2019 World Championships and other related materials in preparation for selection committee meeting	.60	174.00
9/23/19	JB	Finalize electronic binder containing documents to be provided for upcoming SafeSport audit	3.70	499.50
9/23/19	ACC	Office conference with Christopher J. Schneider regarding updating the board of directors handbook	.30	64.50
9/23/19	JE	Review of proposed brokerage agreement for seller	.20	88.00
9/23/19	JE	Preparation of mark-up of proposed brokerage listing agreement	.30	132.00
9/23/19	AEM	Email correspondence with Annie Heffernon regarding World Championships selection committee meeting	.10	29.00
9/23/19	AEM	Draft Ted Stevens Act presentation	1.20	348.00
9/23/19	AEM	Participate in selection committee meeting for 2019 World Championships	1.30	377.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 17
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/23/19	AEM	Analyze legislative recommendations to Ted Stevens Act for presentation to organization	.80	232.00
9/23/19	MDP	Revise event agreement for 2020 event	.30	58.50
9/23/19	CJS	Correspondence with Michael D. Penny regarding Board of Directors minutes	.10	35.00
9/23/19	CJS	Analysis of participant status for persons subject to Center's administrative holds	1.00	350.00
9/23/19	CJS	Correspondence with the Center regarding administrative holds	.30	105.00
9/23/19	CJS	Telephone conference with SafeSport team regarding information needed for Center's audit	.50	175.00
9/23/19	CJS	Draft introduction for certain material needed for the Center's audit	.40	140.00
9/23/19	CJS	Revise new draft of contractor agreement	.80	280.00
9/23/19	CJS	Revise additional introduction for material for the Center's audit	.30	105.00
9/23/19	CJS	Initial analysis of real estate broker agreement	.30	105.00
9/23/19	CJS	Office conference with James Ens regarding real estate broker contract	.10	35.00
9/23/19	CJS	Revise introduction for third section of materials for the Center's audit	.20	70.00
9/23/19	CJS	Analysis of SafeSport matter, per Mark Busby request	.30	105.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 18
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/23/19	CJS	Office conference with Alejandra Contreras regarding updates to Board handbook	.20	70.00
9/23/19	CJS	Lengthy correspondence exchange with Mark Busby regarding several SafeSport matters	.40	140.00
9/23/19	CJS	Revisions to agreement with sport commission for event	.50	175.00
9/23/19	CJS	Attend SafeSport team meeting by telephone	.30	105.00
9/23/19	CJS	Finalize pdf of information needed for the Center's audit	.40	140.00
9/23/19	CJS	Telephone conference with Melissa Root regarding commercial lease	.10	35.00
9/23/19	CJS	Correspondence with the Center regarding materials for audit	.30	105.00
9/23/19	CJS	Correspondence with Kathryn Carson and Lois Bigham regarding Board of Directors	.20	70.00
9/24/19	JE	Conference with Christopher J. Schneider regarding marked-up brokerage agreement	.20	88.00
9/24/19	MDP	Conference call with Christopher J. Schneider and Jacqui Godfrey at USA Gymnastics discussing event agreement	.90	175.50
9/24/19	MDP	Conference meeting with Christopher J. Schneider discussing next steps concerning the event agreement	.10	19.50
9/24/19	DAP	Communication with insurer regarding insurance claim	.30	135.00

PO Box 306
 Grand Rapids, Michigan 49501-0306
 616.831.1700
 TAX ID# 38-1603110

USA Gymnastics

Page 19
 Inv# 1711519
 Date 10/18/2019
 42721.00006-DJG

9/24/19	CJS	Analysis of revisions to real estate broker contract	.20	70.00
9/24/19	CJS	Office conference with Jim Ens regarding real estate broker contract	.10	35.00
9/24/19	CJS	Correspondence with Stefanie Korepin regarding real estate broker contract	.10	35.00
9/24/19	CJS	Correspondence with membership and SafeSport departments regarding verification of information	.10	35.00
9/24/19	CJS	Revisions to consulting agreement	.40	140.00
9/24/19	CJS	Revise guidelines for medical providers, photography vendors, and interpreters	1.90	665.00
9/24/19	CJS	Prepare for senior leadership team meeting	.20	70.00
9/24/19	CJS	Attend senior leadership team meeting by phone	1.30	455.00
9/24/19	CJS	Telephone conference with Stefanie Korepin regarding contract template for events	.60	210.00
9/24/19	CJS	Follow-up conference with Michael D. Penny regarding template for event contracts and training	.40	140.00
9/24/19	CJS	Correspondence with Mark Busby and Mary Tabin regarding personnel matter	.10	35.00
9/24/19	CJS	Lengthy correspondence with Mark Busby regarding several SafeSport matters	.30	105.00
9/24/19	CJS	Telephone conference with Mark Busby	.50	175.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 20
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

regarding SafeSport matters

9/24/19	CJS	Analysis of membership implication to SafeSport matter	.30	105.00
9/24/19	CJS	Correspondence with Li Li Leung regarding membership implications of SafeSport matter	.20	70.00
9/24/19	CJS	Correspondence with Kathryn Carson and Lois Bingham regarding board of directors	.20	70.00
9/24/19	CJS	Telephone conference with Erica Koven and Shelba Waldron regarding policy on medical personnel, photographers, and interpreters	.30	105.00
9/24/19	CJS	Revise policy on medical personnel, photographers, and interpreters	.20	70.00
9/24/19	CJS	Communication with Alejandra Contreras regarding document management matters	.10	35.00
9/24/19	CJS	Revise letter to member club regarding SafeSport matter	.50	175.00
9/24/19	CJS	Draft correspondence to vendor regarding contract revisions	.40	140.00
9/24/19	CJS	Telephone conference with Justin Spring regarding membership issue	.10	35.00
9/24/19	CJS	Communications with D. Andrew Portinga regarding copyright matter	.10	35.00
9/24/19	CJS	Begin analysis of response to event contract comments from the venue	.30	105.00
9/24/19	MLT	Communications with Christopher J. Schneider regarding personnel matter	.20	80.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 21
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/25/19	AMC	Correspondence regarding USOPC and National Team Agreement	.30	87.00
9/25/19	ACC	Review files in Relativity related to a certain individual [REDACTED] per Christopher J. Schneider request	2.00	430.00
9/25/19	MMO	Draft confidentiality and HIPAA language for offer letter and update confidentiality agreement and policy on confidential information to include health and medical information	1.10	302.50
9/25/19	MDP	Conference call with Christopher J. Schneider, Jacqui Godfrey, and representatives from venue to discuss event agreement	.90	175.50
9/25/19	MDP	Conference meeting with Christopher J. Schneider discussing next steps for Salt Lake License Agreement	.30	58.50
9/25/19	CJS	Correspondence with Stefanie Korepin and Matthew M. O'Rourke regarding revisions to offer letter	.10	35.00
9/25/19	CJS	Review new draft of contract with consultant	.10	35.00
9/25/19	CJS	Correspondence with Li Li Leung regarding negotiation of contract with consultant	.20	70.00
9/25/19	CJS	Correspondence with Stefanie Korepin regarding revised offer letter and confidentiality agreement	.20	70.00
9/25/19	CJS	Correspondence with Mark Busby regarding several SafeSport matters	.30	105.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 22
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/25/19	CJS	Correspondence from Scott Lineberry regarding selection committee matter	.10	35.00
9/25/19	CJS	Correspondence from D. Andrew Portinga regarding analysis of amended complaints in connection with claims against USAG	.10	35.00
9/25/19	CJS	Analysis of event contract for Trampoline & Tumbling	1.70	595.00
9/25/19	CJS	Telephone conference with Jacqui Godfrey regarding event contract	.80	280.00
9/25/19	CJS	Correspondence with the Center regarding administrative holds	.20	70.00
9/25/19	CJS	Analysis of background check matter, per Mark Busby request	.20	70.00
9/25/19	CJS	Analysis of SafeSport check information regarding candidate	.50	175.00
9/26/19	CJS	Correspondence with Cathy Allen regarding various policies	.30	105.00
9/26/19	CJS	Correspondence with Alejandra Contreras regarding requested information	.20	70.00
9/26/19	CJS	Telephone conference with Li Li Leung regarding vendor contract	.20	70.00
9/26/19	CJS	Finalize consultant contract	.70	245.00
9/26/19	CJS	Draft letter to WADA requesting clarification of decision	1.20	420.00
9/26/19	CJS	Attend SafeSport team meeting by telephone	.70	245.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 23
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/26/19	CJS	Call with Li Li Leung, Stefanie Korepin, Mark Busby, and Brett McClure regarding membership matter	.80	280.00
9/26/19	CJS	Draft letter regarding membership matter	.80	280.00
9/26/19	CJS	Correspondence from counsel regarding third party discovery request in unrelated case	.20	70.00
9/27/19	ACC	Per Christopher J. Schneider request, review files related to SafeSport check	1.10	236.50
9/27/19	AEM	Revise selection committee report for 2019 World Championships	.60	174.00
9/27/19	AEM	Draft presentation on Ted Stevens Act	1.40	406.00
9/27/19	MDP	Review executed letter of intent between USA Gymnastics and venue	.70	136.50
9/27/19	MDP	Conference call with Christopher J. Schneider Jacqui Godfrey and event representatives discussing License Agreement	.90	175.50
9/27/19	MDP	Conference with Christopher J. Schneider discussing next steps for venue contract	.30	58.50
9/27/19	MDP	Attention to email from Christopher J. Schneider regarding addendum for event contract	.20	39.00
9/27/19	MDP	Conference meeting with Christopher J. Schneider discussing addendum to event contract	.30	58.50
9/27/19	DAP	Office conference with Christopher J.	.20	90.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 24
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

Schneider regarding third-party
discovery request from case in
Washington

9/27/19	DAP	Review correspondence from lawyer in Washington seeking records	.20	90.00
9/27/19	CJS	Telephone conference with Mark Busby regarding hearing process	.20	70.00
9/27/19	CJS	Revise proposed MOU with sports commission	.50	175.00
9/27/19	CJS	Office conference with D. Andrew Portinga regarding third party discovery request in unrelated case	.30	105.00
9/27/19	CJS	Analysis of SafeSport check information for candidate	.50	175.00
9/27/19	CJS	Telephone conference with Melissa Root regarding discovery request in unrelated third party case	.10	35.00
9/27/19	CJS	Telephone conference with Leslie King regarding legal advice on communications statement	.20	70.00
9/27/19	CJS	Telephone conference with Jacqui Godfrey, Michael D. Penny, and venue regarding revisions to event contract	.90	315.00
9/27/19	CJS	Follow-up conference with Michael D. Penny regarding revisions to venue contract for Trampoline & Tumbling event	.30	105.00
9/27/19	CJS	Telephone conference with coverage counsel regarding Epiq's invoices	.20	70.00
9/27/19	CJS	Finalize letter to [REDACTED]	.20	70.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 25
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

regarding membership matter

9/27/19	CJS	Draft correspondence to opposing counsel regarding third party discovery request in unrelated civil case	.60	210.00
9/27/19	CJS	Office conference with Michael D. Penny regarding amendment to consortium contract	.50	175.00
9/27/19	CJS	Correspondence with Jeff Smith regarding revisions to event contract	.20	70.00
9/27/19	CJS	Revise proposed response to Senator's request for information	.50	175.00
9/27/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
9/28/19	CJS	Telephone conference with Kevin White regarding membership matter	.30	105.00
9/30/19	ACC	Per Christopher J. Schneider, review documents in Relativity for SafeSport check	5.00	1,075.00
9/30/19	ACC	Email to Christopher J. Schneider regarding documents in Relativity related to SafeSport check	.20	43.00
9/30/19	MDP	Review Kansas City USA Gymnastics Board of Directors meeting notes and draft regular meeting minutes	1.40	273.00
9/30/19	CJS	Review Stefanie Korepin's notes from USOPC assembly	.10	35.00
9/30/19	CJS	Correspondence with Lois Bingham regarding due diligence on candidate	.10	35.00

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 26
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

9/30/19	CJS	To Colorado Springs for meeting with USOPC	7.20	2,520.00
9/30/19	CJS	Lengthy email correspondence with Mark Busby regarding SafeSport matters	.30	105.00
9/30/19	CJS	Analysis of materials regarding SafeSport check for candidate	.50	175.00
TOTAL HOURS			183.30	
Total Services				54,829.50

Attorney Summary

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ens, James	Member	.70	440.00	308.00
Portinga, D. Andrew	Member	3.60	450.00	1,620.00
Schneider, Christopher J.	Member	109.60	350.00	38,360.00
Tabin, Mary L.	Member	.30	400.00	120.00
Marchand, Neil J	Member	.30	300.00	90.00
Carson, Anne Marie	Associate	1.00	290.00	290.00
Edsenga, Patrick M.	Member	.40	300.00	120.00
Harden, Brittany R.	Associate	.70	290.00	203.00
Murphy, Amy E.	Associate	6.40	290.00	1,856.00
O'Rourke, Matthew M.	Associate	4.80	275.00	1,320.00
Penny, Michael D	Associate	25.90	195.00	5,050.50
Brickner, Jessica M.	Paralegal	9.70	135.00	1,309.50
Woods, Kristen E.	Paralegal	4.80	195.00	936.00
Contreras-Caballero, Alej	Associate	15.10	215.00	3,246.50
		183.30		54,829.50

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 27
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

Expenses

CHRISTOPHER J. SCHNE Check # - 9990	307.40
Mileage	
CHRISTOPHER J. SCHNE Check # - 9990	44.52
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	364.62
Travel Expense-Hotel	
CHRISTOPHER J. SCHNE Check # - 9990	9.81
Meals	
Reproductions 15 pages	2.25
Reproductions 3 pages	.45
Reproductions 3 pages	.45
CHRISTOPHER J. SCHNE Check # - 9990	9.81
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	73.03
Meals	
STATE OF MICHIGAN Check # - 2019100	20.00
Filing Fee	
Reproductions 19 pages	2.85
Reproductions 22 pages	3.30
Reproductions 1 pages	.50
Reproductions 17 pages	2.55
Reproductions 1 pages	.50
Reproductions 22 pages	3.30
Reproductions 1 pages	.50
Computer Assisted Research	32.00
Reproductions 280 pages	42.00
Reproductions 47 pages	7.05
Reproductions 37 pages	5.55
Reproductions 18 pages	2.70
CHRISTOPHER J. SCHNE Check # - 9990	30.09
Taxi	
CHRISTOPHER J. SCHNE Check # - 9990	17.42
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	10.57
Meals	

Total Expenses

993.22

Total This Invoice

55,822.72

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 28
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

Invoices Due Upon Receipt

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

USA Gymnastics

Page 29
Inv# 1711519
Date 10/18/2019
42721.00006-DJG

OUTSTANDING ACCOUNTS RECEIVABLE

INVOICE NUMBER	DATE	INVOICE AMOUNT	PAYMENTS AGAINST INVOICE	INVOICE BALANCE
1690179	2/14/19	73,608.76	59,124.96	14,483.80
1691021	3/18/19	64,476.01	51,679.21	12,796.80
1694037	4/17/19	81,436.49	65,321.49	16,115.00
1696899	5/21/19	73,299.57	59,053.17	14,246.40
1699811	6/13/19	83,847.71	67,560.31	16,287.40
1702747	7/15/19	94,745.27	77,446.17	17,299.10
1705622	8/20/19	30,636.70	24,523.50	6,113.20
1708524	9/20/19	54,643.04	.00	54,643.04
Prior Unpaid Balance				151,984.74
Total Amount Due				207,807.46

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

Inv# 1711519
Date 10/18/2019
42721.00006-DJG

USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: CJS Chief Legal Officer

REMITTANCE ADVICE

For Legal Services Rendered through September 30, 2019

Total Services 54,829.50

Total Expenses 993.22

Total This Invoice 55,822.72
=====

Invoice Is Due Upon Receipt

Our remit address is: PO Box 306, Grand Rapids, MI. 49501-0306

Payments: If paying by check please return the remittance advice or write your invoice number(s) on your check. You may also pay by credit or debit card through our online payment portal www.millerjohnson.com/onlinepayments. If you have any questions regarding this invoice or you wish to set up ACH payments please call 616-831-1700 and ask for the collections department.